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12 Attorneys for United States of America

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) Case No. 3:21-CR-274 CRB  
17 Plaintiff, )  
18 v. ) STIPULATION AND PROPOSED ORDER  
19 IAN BENJAMIN ROGERS, and ) CONTINUING HEARING  
20 JARROD COPELAND, )  
21 Defendants. )  
22 \_\_\_\_\_)

23 On July 8, 2021, the grand jury issued a six-count indictment charging Ian ROGERS and Jarrod  
24 COPELAND with conspiring to destroy a building by arson or explosive device, weapons violations and  
25 obstruction of justice. ROGERS has been (and remains) in custody in Napa County facing weapons  
26 charges since January, 2021. The parties made their first appearance in District Court on August 18,  
27 2021. ROGERS appeared pursuant to a writ issued February 18, 2021. At that time, the parties agreed  
to continue the matter for a status conference on October 27, 2021. Since then, the government has  
provided additional discovery. In addition, counsel for ROGERS has been engaged in a multi-week  
homicide trial in state court.

28 The parties hereby request that the Court continue the status hearing from October 27, 2021 to

1 December 1, 2021. The continuance will allow the government the time needed to produce additional  
2 discovery and enable both parties to be in a better position to discuss both the pending charge and  
3 potential resolution. In addition, it will allow the parties the ability to coordinate with counsel in the  
4 parallel state proceeding. The government has been negotiating his transfer to federal custody, but as of  
5 this filing, he remains in state custody.

6 For these reasons, and to allow for the effective preparation of counsel, the parties agree that the  
7 ends of justice served by excluding the time from October 27, 2021 through December 1, 2021 from  
8 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a  
9 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

10 IT IS SO STIPULATED.

11 DATED: October 19, 2021

Respectfully submitted,

12 STEPHANIE M. HINDS  
13 Acting United States Attorney

14 \_\_\_\_\_/s/  
15 FRANK J. RIEBLI  
16 Assistant United States Attorney

17 \_\_\_\_\_/s/ Frank Riebli w/ permission for \_\_\_\_\_  
18 COLIN COOPER  
19 Attorney for Ian Rogers

20 \_\_\_\_\_  
21 JOHN AMBROSIO  
22 Attorney for Jarrod Copeland

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10 SAN FRANCISCO DIVISION

11 UNITED STATES OF AMERICA, ) Case No. 21-CR-274 CRB

12 Plaintiff, )

13 v. )

14 IAN BENJAMIN ROGERS, and ) STIPULATION AND PROPOSED ORDER  
JARROD COPELAND, ) CONTINUING HEARING

Defendants. )

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4 homicide trial in state court.

5 The parties hereby request that the Court continue the status hearing from October 27, 2021 to  
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16 DATED: October 19, 2021

Respectfully submitted,

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20 FRANK J. RIEBLI  
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23 COLIN COOPER  
24 Attorney for Ian Rogers

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JOHN AMBROSIO  
Attorney for Jarrod Copeland

[PROPOSED] ORDER

For the reasons set forth above, the Court hereby continues the status hearing in the above-captioned matter from October 27, 2021 until **December 1, 2021, at 9:00 a.m.** Further, to allow for the continued production of discovery and the effective preparation of counsel, the Court finds that the ends of justice served by granting the continuance outweigh the interests of the public and the defendant, and thus the Court excludes that period of time from the running of the speedy trial clock under Rule 5.1 and 18 U.S.C. § 3161(b). The Court further orders that, to the extent that Ian Rogers remains in state custody, the U.S. Marshal and the Director of Corrections of the Napa County Department of Corrections shall produce Ian Rogers for the hearing on December 1, 2021, as provided in the writ issued on February 18, 2021 in this matter.

IT IS SO ORDERED.

DATED: October \_\_\_\_ , 2021

HON. CHARLES R. BREYER  
United States District Judge

1 [PROPOSED] ORDER  
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7 thus the Court excludes that period of time from the running of the speedy trial clock under Rule 5.1 and  
8 18 U.S.C. § 3161(b). The Court further orders that, to the extent that Ian Rogers remains in state  
9 custody, the U.S. Marshal and the Director of Corrections of the Napa County Department of  
10 Corrections shall produce Ian Rogers for the hearing on December 1, 2021, as provided in the writ  
11 issued on February 18, 2021 in this matter.

12 IT IS SO ORDERED.  
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14 DATED: October \_\_\_\_\_, 2021

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16 HON. CHARLES R. BREYER  
17 United States District Judge  
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